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BEFORE THE ARIZONA CORPORATIO. RECEIVED

COMMISSIONERS 2 GARY PIERCE- CHAIRMAN PAUL NEWMAN SANDRA D. KENNEDY **BOB STUMP** 4

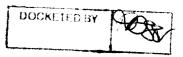
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AZ CORP COMMISSION DOCKET CONTROL

Arizona Corporation Commission DOCKETED

JUL 26 2011



IN THE MATTER OF THE PETITION OF I-) WIRELESS, LLC FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER) IN THE STATE OF ARIZONA FOR THE LIMITED PURPOSE OF OFFERING LIFELINE SERVICE TO QUALIFIED HOUSEHOLDS.

COMMENTS ON STAFF REPORT

DOCKET NO. T-20538A-10-0332

i-wireless, LLC ("i-wireless") submits the following comments on the Staff Report docketed on July 18, 2011. i-wireless intends these comments to minimize areas of dispute regarding its Eligible Telecommunications Carrier ("ETC") designation in Arizona.

1. Service on Tribal Lands.

i-wireless agrees with the Arizona Corporation Commission ("ACC" or "Commission") Staff that the Commission has jurisdiction and authority to grant ETC status on Tribal lands. However, the Staff Report does not take an express recommendation on granting i-wireless an ETC designation on Tribal lands. In order to eliminate ALECA's concerns regarding ETC designation on Tribal lands, i-wireless no longer intends to provide Lifeline to persons residing on Federally-Recognized Tribal lands, regardless of whether those lands are served by a Tribal carrier. However, where a zip code covers both non-Tribal and Tribal lands, i-wireless still intends to provide low-income support to those residents in the zip code who do not live on Tribal lands. In order to avoid low-income support to residents of Tribal lands, i-wireless' Lifeline enrollment application will require a street address (not a P. O. Box address) and will include a self-certification of Non-Tribal Land Residency, which will require applicants to self-certify, under penalty of perjury, that they do not reside in Federally-Recognized Tribal lands.

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2. 250 Minute Plan.

One of Commission Staff's proposed conditions is that i-wireless should provide Lifeline customers who chose the 250 minute plan with free access to Customer Service from i-wireless handsets. i-wireless agrees to do so if it offers the 250 minute plan to Lifeline customers in Arizona. However, to be clear, i-wireless may choose not to offer the 250 minute plan to Lifeline customers in Arizona. If that is the case, i-wireless' marketing materials in Arizona will clearly reflect that circumstance.

Conclusion.

i-wireless appreciates Commission Staff's recommendation that the Commission approve i-wireless' Application for Designation as an Eligible Telecommunications Carrier. i-wireless requests that the Commission approve the Application in this docket as clarified above.

RESPECTFULLY SUBMITTED this 24 day of July 2011.

ROSHKA DEWULF & PATTEN, PLC

By

Michael W. Patten

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Phoenix, Arizona 85004

Original and 13 copies of the foregoing filed this 26 day of July 2011 with:

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Arizona Corporation Commission

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Docket Control

Copy of the foregoing hand-delivered/mailed this <u>26th</u> day of July 2011 to:

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Administrative Law Judge

Hearing Division

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